

Plaintiffs may use the following persons at trial to present evidence under Federal Rule of Evidence 702, 703 or 705.

Dr. Johnny Edward “Rusty” Bates

88 Salser Lane

Columbiana, Alabama 35051

(205) 382-2619

Johnny.bates@gchcweb.net

Dr. Bates has been involved in correctional healthcare for over thirty years and has owned and managed a correctional healthcare company for the last seventeen years with over 350 employees and contracts in multiple states. Dr. Bates will testify to the opinions set forth in his report. Dr. Bates is double board certified in Internal Medicine and Addiction Medicine and has taken care of numerous patients just like Mr. Garrett and I am intimately familiar with the correctional setting and the capabilities and limitations of practicing in this setting. Dr. Bates is a CCHPP through the NCCHC and is a fellow of the American College of Correctional Physicians.

Dr. Bates’ testimony will be based upon his training, experience, research, education, and review of materials produced in this litigation. Expected exhibits to which this witness may refer or rely upon when giving his testimony at trial are not fully known at this time but are expected to include all documents he has reviewed, related jail records, relevant literature, any written report of this witness or other expert witness designated by any other party hereto, and any of the testimony of any party or other witness, the documents produced in this cause, depositions in this cause, and exhibits to said depositions. Plaintiffs will supplement their list of expected trial exhibits and expected testimony as discovery proceeds in this case. This witness may refer to or rely upon any exhibit shown to or admitted into evidence by any other witness. Finally, Dr. Bates reserves the right to supplement and amend his report and opinions based on additional records.

Dr. Bates also incorporates herein for all purposes as though set forth verbatim, the testimony of Dr. Bates in his oral deposition, if any, reflecting his opinions and conclusion, as supplemented through the discovery phase of this case.

Dr. Bates is compensated at the rate of \$650.00 per hour for all activities related to this case.

Dr. Bates’ CV, case list, and full report has been produced to Defendants.

Stacy Sinner

504 10th Street Northeast

Kasson, MN 55944

507-993-8865

stacyesinner@gmail.com

Stacy Sinner has worked in the field of Corrections for over 30 years. She has been a military police officer, correctional officer, training and compliance supervisor, accreditation manager for American Correctional Association standards and National Commission on Correctional Health Care standards. Ms. Sinner has been an operations captain and held the appointed position of Director of Detention Services for 20 years in Olmsted County, MN. She has worked closely with Mayo Clinic, public health departments, and other contract medical providers in developing policy for jails based on state standards, national standards and best practices. Ms. Sinner is the principal author of a publication titled “Supervising Inmates” that was written for the National Institute of Corrections under technical assistance funding in support of the Strategic Inmate Management initiative. That

publication is currently being edited for release later this year.

Ms. Sinner' testimony will be based upon his training, experience, research, education, and review of materials produced in this litigation. Expected exhibits to which this witness may refer or rely upon when giving his testimony at trial are not fully known at this time but are expected to include all documents he has reviewed, related jail records, relevant literature, any written report of this witness or other expert witness designated by any other party hereto, and any of the testimony of any party or other witness, the documents produced in this cause, depositions in this cause, and exhibits to said depositions. Plaintiffs will supplement their list of expected trial exhibits and expected testimony as discovery proceeds in this case. This witness may refer to or rely upon any exhibit shown to or admitted into evidence by any other witness. Finally, Ms. Sinner reserves the right to supplement and amend her report and opinions based on additional records.

Ms. Sinner also incorporates herein for all purposes as though set forth verbatim, the testimony of Ms. Sinner in her oral deposition, if any, reflecting her opinions and conclusion, as supplemented through the discovery phase of this case.

Ms. Sinner is compensated at the rate of \$275.00 per hour for all activities related to this case.

Ms. Sinner's CV and full report has been produced to Defendants.

II. NON-RETAINED EXPERTS

Christus Santa Rosa Hospital

600 N Union Ave.

New Braunfels, Texas 78130

Physicians, nurses, agents, representatives, employees, and/or custodian of medical and billing records.

III. OTHER PARTIES' EXPERTS

Plaintiffs reserve the right to elicit testimony from any and all expert witnesses designated in this case by other parties. Plaintiffs state that they have not determined who will be called to testify at the trial of this cause however reserves the right to elicit opinion testimony from any and all witnesses or experts who may be designated by Defendants and hereby reserves the right to call those witnesses during Plaintiffs' case in chief or for rebuttal. Plaintiff City further reserves the right to designate any experts listed herein.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that on Monday, October 31, 2022, a true and correct copy of the foregoing document has been served to all counsel of record via ECF notification in accordance with the Federal Rules of Civil Procedure.

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OFFICER ALBERTO GONZALEZ; OFFICER ASHLEY OZUNA; AND
SERGEANT THOMAS GARZARECK**

/s/ Tim Maloney
TIM MALONEY